



City of Sebastopol

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October 2, 1996

Ms. Marie Meredith
City of Santa Rosa Community Development Department
P. O. Box 1678
Santa Rosa, CA 95402-1678

CITY OF SANTA ROSA
P.O. Box 1678
Santa Rosa, CA 95402

OCT 04 1996

**DEPARTMENT OF
COMMUNITY DEVELOPMENT**

Re Santa Rosa Sub-Regional Long Term Wastewater Project
Draft Environmental Impact Report/Environmental Impact Statement

Dear Ms. Meredith:

At their meeting of October 1, 1996, the Sebastopol City Council held a discussion of the Draft EIR/EIS. At the conclusion of the discussion City Staff was directed to forward the following comments for consideration and inclusion in the Final EIR.

1. The Draft EIR/EIS does not include a full cost-benefit analysis of the various alternatives. Such an analysis ought to include, among other things, discussion of the long-term economic benefits of re-use, the value of wastewater as a commodity, the potential for return on investment associated with the various alternatives, and the costs (or benefits) of the impacts identified for the various alternatives. As an example, how might the economy of the region be harmed by the negative health impacts of increased discharge to the Russian River and/or the Laguna? How might a perceived risk to public health affect the economy of the region? 001
2. There is no discussion of potential degradation of groundwater quality due to continued and/or increased discharges directly to the Laguna de Santa Rosa or due to increased irrigation. Specifically, what are the potential impacts to the City of Sebastopol Municipal Water System and to private wells in the vicinity of Sebastopol? 002
3. What are the health risks to consumers of edible crops irrigated with wastewater containing high levels of nitrates? What impact would a perception of health risk have on the agricultural production value of crops so irrigated? 003
4. What are the health risks associated with the use of tertiary treated wastewater for spray irrigation or direct discharge to the receiving waters due to pathogens which become airborne, or which may live in the soil for extended periods of time? What is the potential danger to the public coming into contact with soil, water or airborne spray? 004
5. The report discusses the impacts of flooding on the various alternatives only in terms of the 100-year frequency storm. Sebastopol experiences flooding of the area immediately adjacent to the Laguna on a much greater frequency. The analysis should be expanded to include a consideration of the greater frequency storm events which are more typical. 005
6. An alternative project based on the concept of reforestation with redwood trees irrigated with treated wastewater should be given consideration in the study. 006

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Ms. Marie Meredith
City of Santa Rosa Community Development Department
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On behalf of the Sebastopol City Council, these comments and questions are offered for inclusion in the Draft EIR. Your consideration of these comments is appreciated

Sincerely,



Paul V. Berlant
City Manager

cc: Mayor and City Council